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Fireworks Co., LTD and 1.4G Holdings, LLC.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JIANGXI PANDA FIREWORKS CO., LTD.,
a Chinese entity,

Plaintiff(s),

vs.

DOUGLAS BURDA, an individual;
KONCEPT LLC, a Nevada limited liability
company doing business as BURDA IP;
ELISSA BURDA, an individual; RED APPLE
FIREWORKS CO., LTD., a Nevada limited
liability company; 1.4G HOLDINGS, LLC, a
Nevada limited liability company.

Defendant(s).

CASE NO. 2:23-cv-01232-MMD-DJA

**STIPULATION AND ~~[PROPOSED]~~
ORDER STAYING DEADLINES
PENDING FINALIZATION OF
SETTLEMENT**

[SIXTH REQUEST]

Plaintiff Jiangxi Panda Fireworks Co. Ltd. ("Plaintiff") and remaining Defendants 1.4G Holdings, LLC and Red Apple Fireworks Co. Ltd. ("Defendants"), by and through their respective counsel of record, pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby notify the Court that the parties have reached a settlement agreement in principle, and hereby stipulate and agree that all pending deadlines in this matter be stayed for sixty (60) days so that

1 the parties may finalize a formal written agreement. This is the sixth request to stay or extend
2 discovery deadlines over the course of this litigation.

3 The parties will file a stipulated dismissal of all claims once their settlement agreement is
4 finalized and executed, or a status report in sixty (60) days if such dismissal has not occurred.

5 **IT IS SO STIPULATED.**

6 DATED this 2nd day of April, 2025.

DATED this 2nd day of April, 2025.

7
8 **GREENBERG TRAURIG, LLP**

BAYRAMOGLU LAW OFFICES LLC

9 /s/ Bethany L. Rabe

/s/ David Silver

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16 **IT IS SO ORDERED.**

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18 DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

19 DATED: 4/3/2025
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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2025, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

By: /s/ Chris Darling

Chris Darling

An employee of GREENBERG TRAURIG, LLP